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[Additional counsel on signature page]

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

In re TORONTO-DOMINION BANK/FIRST HORIZON **CORPORATION SECURITIES** LITIGATION

Master File No. 23-02763 (RMB/AMD)

JOINT STIPULATION AND **ORDER**

WHEREAS, on February 3, 2025, the Court entered an order (ECF No. 73) establishing a schedule for the filing of the TD Defendants' and First Horizon Defendants' supplemental opening briefs in support of their motions to dismiss the Third Amended Complaint (the "Complaint") by March 14, 2025, Lead Plaintiffs' supplemental opposition brief by April 25, 2025, and the TD Defendants' and First Horizon Defendants' supplemental reply briefs by May 16, 2025;

WHEREAS, the Complaint asserts claims against two new individual defendants, Michael Bowman and Mia Levine (the "New Defendants"), in addition to the TD Defendants and First Horizon Defendants;

WHEREAS, the New Defendants have recently engaged counsel and intend to move to dismiss the Complaint;

WHEREAS, to ensure that the New Defendants have adequate time to prepare and file briefing on their anticipated motions to dismiss, and to avoid piecemeal briefing regarding the same claims and align the briefing schedules in order to serve the interests of judicial efficiency for both the parties and the Court, the parties have agreed to the revised schedule below, and for Plaintiffs to file one omnibus brief in opposition to all Defendants' motions to dismiss;

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¹ "TD Defendants" are Defendants The Toronto-Dominion Bank, TD Bank US Holding Company, Bharat B. Masrani, Kelvin Vi Luan Tran, and Leo Salom. "First Horizon Defendants" are Defendants First Horizon Corporation, D. Bryan Jordan and Hope Dmuchowski.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, through their undersigned counsel and subject to this Court's approval:

- The TD Defendants and First Horizon Defendants shall file 1. supplemental opening briefs by March 21, 2025;
- 2. The New Defendants shall file their motions to dismiss by April 11, 2025;
- Lead Plaintiffs shall file their omnibus opposition brief in opposition to 3. all Defendants' motions to dismiss by May 9, 2025;
 - 4. All Defendants shall file their reply briefs by June 6, 2025.

Dated: March 12, 2025

CARELLA, BYRNE, CECCHI, **BRODY & AGNELLO, P.C.**

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Counsel for Defendant Mia Levine

IT IS SO ORDERED

DATED: March 14, 2025

Honorable Renée Marie Bumb Chief United States District Judge